

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,

Plaintiff,

vs.

MICRON TECHNOLOGY, INC.;
MICRON SEMICONDUCTOR
PRODUCTS, INC.; MICRON
TECHNOLOGY TEXAS LLC,

Defendants.

Case No. 2:22-cv-294-JRG

JURY TRIAL DEMANDED

JOINT MOTION TO EXTEND DEADLINES

Plaintiff Netlist, Inc. (“Netlist”) and Defendants Micron Technology, Inc., Micron Semiconductor Products, Inc., and Micron Technology Texas LLC (collectively “Micron”) file this joint motion and request that the Court extend the existing briefing deadlines for the following:

Event	Current Deadline	Proposed Deadline
Reply In Support of Defendants’ Renewed Motion for Judgment as a Matter of Law on Damages [Dkt. 156]	October 3, 2024	October 10, 2024
Reply In Support of Defendants’ Renewed Motion for Judgment as a Matter of Law of No Willfulness of the Asserted Patents [Dkt. 157]	October 3, 2024	October 10, 2024
Reply In Support of Defendants’ Rule 59 Motion for New Trial [Dkt. 158]	October 3, 2024	October 10, 2024
Reply In Support of Defendants’ Rule 50(B) Motion for Judgment as a Matter of Law for Non-Infringement Regarding U.S. Patent Nos. 7,619,912 and 11,093,417 [Dkt. 159]	October 3, 2024	October 10, 2024

Event	Current Deadline	Proposed Deadline
Sur-Reply to Defendants' Renewed Motion for Judgment as a Matter of Law on Damages [Dkt. 156]	October 17, 2024	October 30, 2024
Sur-Reply to Defendants' Renewed Motion for Judgment as a Matter of Law of No Willfulness of the Asserted Patents [Dkt. 157]	October 17, 2024	October 30, 2024
Sur-Reply to Defendants' Rule 59 Motion for New Trial [Dkt. 158]	October 17, 2024	October 30, 2024
Sur-Reply to Defendants' Rule 50(B) Motion for Judgment as a Matter of Law for Non-Infringement Regarding U.S. Patent Nos. 7,619,912 and 11,093,417 [Dkt. 159]	October 17, 2024	October 30, 2024

Good cause exists for the requested extension to allow the parties additional time to prepare meaningful briefing of the issues for the Court's consideration.

WHEREFORE, the parties respectfully request that the Court enter an order extending the deadlines as set forth in the table above.

Dated: September 27, 2024

Respectfully submitted,

By: /s/ Michael R. Rueckheim

Thomas M. Melsheimer
State Bar No. 13922550
TMelsheimer@winston.com
Natalie Arbaugh
State Bar No. 24033378
NArbaugh@winston.com
Rex Mann
State Bar No. 24075509
RMann@winston.com
Tracea L. Rice (*pro hac vice*)
WINSTON & STRAWN LLP
2121 N. Pearl Street, Suite 900
Dallas, TX 75201
Telephone: (214) 453-6500
Facsimile: (214) 453-6400

David P. Enzminger (*pro hac vice*)
denzminger@winston.com
WINSTON & STRAWN LLP
333 South Grand Avenue, 38th Floor
Los Angeles, CA 90071-1543
Telephone: (213) 615-1700
Facsimile: (213) 615-1750

Michael R. Rueckheim
State Bar No. 24081129
MRueckheim@winston.com
Ryuk Park (*pro hac vice*)
RPark@winston.com
Matthew R. McCullough
MRMcCullough@winston.com
WINSTON & STRAWN LLP
255 Shoreline Drive, Suite 520
Redwood City, CA 94065
Telephone: (650) 858-6500
Facsimile: (650) 858-6559

Aldo A. Badini
abadini@winston.com
WINSTON & STRAWN LLP
200 Park Ave., Fl. 43
New York, NY 10166-4193
Telephone: (212) 294-4601
Facsimile: (212) 294-4700

Brian J. Nisbet
Maureen L. Rurka
bnisbet@winston.com
mrurka@winston.com
WINSTON & STRAWN LLP
5 West Wacker Drive, Ste. 4200
Chicago, IL 60601
Telephone: (312) 558-5600
Facsimile: (312) 558-5700

Matthew Hopkins (*pro hac vice*)
State Bar No. 1500598
mhopkins@winston.com
WINSTON & STRAWN LLP
1901 L Street, NW
Washington, DC 20036

Telephone: (202) 282-5000
Facsimile: (202) 282-5100

William M. Logan
State Bar No. 24106214
wlogan@winston.com
Juan C. Yaquian (*pro hac vice*)
State Bar No. 24110559
JYaquian@winston.com
WINSTON & STRAWN LLP
800 Capital Street, Suite 2400
Houston, TX 77002
Telephone: (713) 651-2600
Facsimile: (713) 651-2700

**ATTORNEYS FOR DEFENDANTS
MICRON TECHNOLOGY, INC.,
MICRON SEMICONDUCTOR
PRODUCTS, INC., AND MICRON
TECHNOLOGY TEXAS LLC**

/s/ Andrew Strabone
Jason G. Sheasby (*pro hac vice*)
jsheasby@irell.com
Annita Zhong, PhD (*pro hac vice*)
hzhong@irell.com
Andrew Strabone (*pro hac vice*)
astrabone@irell.com
Yanan Zhao (*pro hac vice*)
yzhao@irell.com
Michael W. Tezyan (*pro hac vice*)
mtezyan@irell.com
IRELL & MANELLA LLP
1800 Avenue of the Stars, Suite 900
Los Angeles, CA 90067
Telephone: (310) 277-1010
Facsimile: (310) 203-7199

Samuel F. Baxter
Texas State Bar No. 01938000
sbaxter@mckoolsmith.com
Jennifer L. Truelove
Texas State Bar No. 24012906
jtruelove@mckoolsmith.com
MCKOOL SMITH, P.C.

104 East Houston Street Suite 300
Marshall, TX 75670
Telephone: (903) 923-9000
Facsimile: (903) 923-9099

Attorneys for Plaintiff Netlist, Inc.

CERTIFICATE OF SERVICE

I certify that, on September 27, 2024, a copy of the foregoing was served on all counsel of record via the Court's ECF system.

/s/ Michael R. Rueckheim
Michael R. Rueckheim

CERTIFICATE OF CONFERENCE

Pursuant to Local Rules CV-7(h) and (i), counsel for the parties met and conferred on the issues and all the parties join the motion.

/s/ Michael R. Rueckheim
Michael R. Rueckheim